

## **REMARKS**

In the Office Action, claim 13 was withdrawn from further consideration, claims 1-8, 14-17 and 20-27 were rejected, and claims 9-12, 18, 19 and 28 were indicated as allowable if rewritten in independent form to include limitations of the base claim and any intervening claims. Applicants thank the Examiner for indicating the allowability of claims 9-12, 18, 19 and 28. By this Reply and Amendment, claims 1 and 16 have been amended, and claim 19 has been canceled without prejudice. All claim amendments are fully supported throughout the specification and figures. No new matter has been added.

Claims 1-8, 14-17 and 20-27 were rejected under 35 USC 102(a) as anticipated by the Adamache et al. reference, US patent No.: 4,988,389. Various aspects of this rejection and the characterization of the cited reference are respectfully traversed, however certain claim amendments have been made to facilitate prosecution and allowance of the present patent application.

The Adamache et al. reference describes a method of producing fluids from subterranean reservoirs. In the embodiment discussed in the Office Action and illustrated in figures 7A-E, an outer tubing 9 is installed within a well casing. A tail pipe section 8 is typically formed with outer tubing 9 as a continuous string, and the tail pipe section extends from an annular seal 10 to a productive interval. A production tubing 3 is concentrically installed in outer tubing 9, and an annular seal 11 is installed between the outer tubing and the production tubing. A tubing check valve 12 also is installed in the production tubing 3 to prevent any fluids that are either within the production tubing or in the annulus pathway 5 "from flowing downwardly" towards the productive interval. A jet pump 4 is located within the production tubing. (See, for example, column 15, lines 25-46; column 16, lines 3-23 and 56-68; column 17, lines 1-9 and 25-45; and column 18, lines 1-21). The Adamache et al. reference, however, does not appear to describe delivering a jet pump and a safety valve to a wellbore location in a single trip downhole, and it certainly does not describe a controllable safety valve that can be used to enable selective flow of fluid upwardly through the wellbore via the jet pump. Rather, the Adamache et al. reference

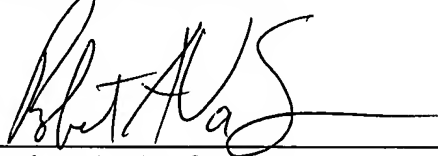
describes tubing check valve 12 as preventing fluids within the production tubing or the annulus pathway from flowing downwardly, as opposed to providing selective control over upward flow.

With specific reference to the pending claims, the Adamache et al. reference fails to disclose or suggest various elements within those claims. For example, the reference fails to describe or suggest a production control unit having a subsurface safety valve which acts to block "upward flow of fluid to the jet pump until actuated to an open position" as recited in amended, independent claim 1. The reference also fails to disclose or suggest controlling the safety valve to enable "selective flow of fluid upwardly" through the wellbore via the jet pump, as recited in independent claim 8. Similarly, the reference fails to disclose or suggest means for "selectively preventing all upward flow of fluid in the wellbore" as recited in independent claim 25. With respect to independent claim 16, the language of directly dependent claim 19 has been added to claim 16. Claim 19 was indicated as allowable and, accordingly, independent claim 16, along with its dependent claims 17-18 and 20-24, should be in condition for allowance.

Furthermore, claims 2-7 ultimately depend from independent claim 1, claims 9-15 ultimately depend from independent claim 8, and claims 26-28 ultimately depend from independent claim 25. Accordingly, those dependent claims also should be patentable over the cited reference for the reasons provided with respect to their corresponding independent claims as well as for the unique subject matter found in those dependent claims.

All pending claims are believed to be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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